



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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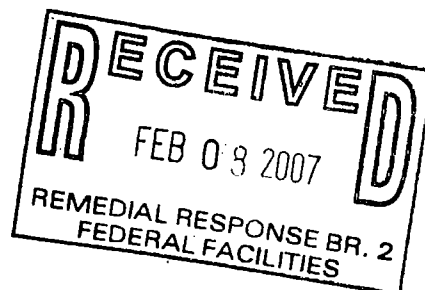
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January 31, 2007

Assistant Chief of Staff for Installation Management
Base Realignment and Closure Division
ATTN: Michael G. Drumheller
600 Army Pentagon
Washington, DC 20310-0600

Re: Fort Sheridan, Landfills 6 and 7
2006 4th Quarter Inspection Reports
Fort Sheridan, Illinois



0970555001/Lake
Fort Sheridan (BRAC)
Superfund/Technical

Dear Mr. Drumheller:

The Illinois Environmental Protection Agency (Illinois EPA or Agency) is in receipt of the Army's Landfill 6 and 7 2006 4th Quarter Inspection Reports. They were dated January 18, 2007 and were received on January 22, 2007. Illinois EPA has reviewed the reports and has generated a few comments that require your attention. They are provided below.

- 1) **Page 2, Gas Collection System O & M** – It states in the second paragraph that two of the probes (MP-07-05 and MP-07-09) continue to exhibit methane concentrations in excess of 50% LEL. Despite this fact, it also states that because they are located close to the edge of the landfill cap rather than near the buffer zone, they will be monitored on a semi-annual basis. This is unacceptable. The Operations and Maintenance Plan, in Section 6.5, clearly states that when the 50% LEL for methane is exceeded in a gas probe, that probe shall be monitored on a monthly basis. Please ensure that those two probes continue to be monitored on a monthly basis until they yield three consecutive months without an exceedance. At that point the monitoring frequency can be reduced back to quarterly.
- 2) **Page 2, Gas Collection System O & M** – The next to last paragraph discusses the results of the 12/12/2006 gas sample collection at the flare. It states that the results indicate an overall decrease in the majority of compound concentrations when compared to the last 3 quarters of gas results. It does not discuss the fact that gas generation rates appear to have been on the rise of late, based upon the length of the most recent run

times of the flare during its bi-weekly operation. In fact, there is no discussion of the length of flare run times at all. This needs to be discussed in these quarterly inspection reports. A greater volume of methane gas generation could be diluting the organic constituent concentrations, which might explain the decreases during the 4th quarter analyses. The results may appear lower when the actual amount being generated has not changed. There may be other explanations as well. Please provide a discussion of potential reasons for the apparent decrease.

- 3) **Page 3, Corrective Actions** – The fifth bulleted item states gas monitoring probe MP-7-1 and gas vent GV-1 are currently buried under a foot of clay and are slated to be abandoned by the Navy's contractor. These monitoring points need to be replaced and put back into the gas monitoring system as soon as possible or, at least, prior to the next monitoring time point. Those points were included in the monitoring system to provide proper coverage around the landfills. Without them in the system, the landfill monitoring is inadequate. Please ensure that the replacement probes are installed and ready for sample collection prior to the first quarterly sampling event of 2007.

If you have any questions regarding this correspondence, you may contact me at 217/557-8155 or via electronic mail at Brian.Conrath@illinois.gov.

Sincerely,

Brian A. Conrath

Brian A. Conrath
Remedial Project Manager
Federal Facilities Unit
Federal Site Remediation Section
Bureau of Land

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cc: Bill Brawner, US Army
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